

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Roberts v. Torrent Pharma, Inc., et al.,
Case No. 3:18-cv-16075

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF ROBIN ROBERTS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Robin Roberts on February 2, 2021 at 10:00 a.m. EST at 9213 Camptown CT, Mechanicsville, Virginia 23116. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: January 12, 2021

Respectfully submitted,

s/ Lori G. Cohen

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Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January, 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Robin Roberts to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on January 12, 2020:

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/s/ Tiffany M. Andras
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